

COOPER LINSE HALLMAN CAPITAL MANAGEMENT, INC.

PRIVACY NOTICE TO OUR CLIENTS

Cooper Linse Hallman Capital Management, Inc. is committed to safeguarding your customer information. We strongly believe in protecting the confidentiality and security of information we collect about you. This notice describes our privacy policy and how we treat the information we receive from you.

Congress recently passed the Graham-Leach-Bliley Act which deals, in part, with how financial companies treat “nonpublic personal information”. The Act requires financial companies to provide customers, clients, and investors, with notice of their privacy policies. Below you will find our policies and practices for collecting, disclosing, and safeguarding nonpublic personal information, which may include financial information and other information about you and is described below. We are committed to your privacy. We take great care to protect the security of your information and to control how it may be used. We appreciate the opportunity to set forth our privacy practices for you.

Information Collected: In the course of serving or administering your relationship and investments, we collect a variety of nonpublic, personal information which is provided by you, as well as other sources, and may include:

- § Information we receive from you, such as your name, address, social security number, assets, and income, as provided, for example, on certain investment advisory applications, subscription agreements, and other forms; and
- § Information about your investments and/or transactions including balances, payment history, parties to transactions, and account history.

Information Protected: We treat your information in a confidential manner. Our employees are required to protect the confidentiality of your information. Employees may access information only when there is an appropriate reason to do so, such as administer your investments, respond to your inquiries, or offer products or services. We also maintain safeguards to protect information and have procedures in place to ensure your information is protected. Employees are required to comply with our established procedures.

Information Disclosed: We do not sell your information, or information about our former clients or investors. We do not disclose your information to anyone except as permitted by law. We only share your information with financial service providers i) as necessary to effect, administer, or enforce a transaction or investment that you request or authorize; ii) in connection with administering, processing or servicing a financial product, investment, or service you authorize; and/or iii) in connection with maintaining your account(s) and/or investments. If you should decide to close your account(s) or sell your investment(s), we will adhere to the privacy policies and practices described in this notice.

Except as described above, your information will not be shared with any third-parties. However, in the event that we are required by law or authorized by you to share your information with government agencies, courts, parties to lawsuits, or regulators, we will share only the information that we are required by law or authorized by you to share.